

1 but I would assume that it was based on the
 2 preliminary plans, since that was the only
 3 information available at the time.
 4 Q The next bullet point item says, "Design of a new
 5 3,000-plus-or-minus-square-foot addition to the
 6 existing building for offices or lunch room,
 7 administrative area, toilet facilities, and
 8 reception area." Do you see that?
 9 A Yes, I do.
 10 Q Do you know where the 3,000-plus-or-minus-square-
 11 foot figure came from?
 12 A Same answer on this. I don't recall exactly where
 13 we came up with that number; except that I can
 14 assume it came from the preliminary plans that were
 15 available, the only information available at the
 16 time of this document.
 17 Q Moving onto the next page, in the middle of the
 18 page, there's a paragraph that begins,
 19 "Administration Building Addition." Do you see
 20 that?
 21 A Yes, I do.
 22 Q And the first bullet point under that says,
 23 "Selective demolition of the existing building at
 24 the main entrance." And is that what we talked
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1 about previously?
 2 A No. It does not. No. It is not.
 3 Q What does that refer to?
 4 A Selective demolition as it's stated, selective. Not
 5 complete demolition.
 6 Q Very good. What does it mean? What selective
 7 demolition was to take place as contemplated by this
 8 document Scope of Services?
 9 A That was yet to be determined as part of the space
 10 needs and programming.
 11 Q Did the preliminary plans include selective
 12 demolition of the existing building at the main
 13 entrance?
 14 A My recollection is it included full demolition from
 15 my recent review of the plans.
 16 Q The second item provides second-floor space within
 17 the new addition for use as storage space. Do you
 18 see that?
 19 A Yes, I do.
 20 Q And that was the second-floor space that the Town
 21 requested at the June 5th meeting?
 22 A I believe that is what it's referring to, yes.
 23 Q They didn't really request it at that meeting. They
 24 referenced that they would like to have a building
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1 with a second floor. Is that more accurate?
 2 A That's accurate.
 3 Q I wanna ask you in particular about the next item.
 4 The design will be based on an addition that is
 5 structurally isolated from the existing building
 6 such that no part of the structural system of the
 7 existing building is modified as a result of the new
 8 construction.
 9 The design will also be based on
 10 using a shallow foundation and concrete floor slab
 11 on grade similar -- and grade of similar
 12 construction to the foundations and floor slabs of
 13 the existing building.
 14 My question is based upon -- or
 15 primarily related to the first sentence. So far,
 16 we've indicated that the preliminary plans identify
 17 roughly 3,000 plus or minus square foot of new
 18 office space and administration areas. Is that
 19 accurate?
 20 A That was my understanding.
 21 Q Did that design or was that design structured and
 22 isolated from the existing building such that any
 23 part of the structural system of the existing
 24 building is modified as a result of the new
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1 construction?
 2 A Are you referring to the preliminary plans?
 3 Q Yes.
 4 A I'm unable to answer that. That was -- that
 5 information wasn't provided as far as I am aware.
 6 Q By looking at the plans, would you be able to tell
 7 whether that set of facts was reflected on the
 8 plans?
 9 A No. I wouldn't be able to.
 10 Q The next area says "Building Renovations." The
 11 first bullet point item says, "Provide new locker,
 12 shower, toilet facilities." Do you see that?
 13 A I'm sorry. Where are we again? Down -- yes.
 14 I see that.
 15 Q Do you know whether new locker, shower, toilet
 16 facilities were reflected on the preliminary plans
 17 as part of the building renovations?
 18 A I'm sorry. Could you ask that one more time. Are
 19 you referring to the preliminary plans?
 20 Q I am. The preliminary plans that were attached
 21 as --
 22 A And do they have new locker, shower, toilet
 23 facilities?
 24 Q In the building renovation.
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SHEET 21 PAGE 81

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1 A My recollection is they did.
 2 Q Mr. Alberti, I have a tough time understanding why
 3 if on January 28th the Town said it didn't wanna use
 4 the preliminary plans that sometime after that,
 5 Gannett Fleming prepared a document that talked
 6 about making substantial modifications to those
 7 plans -- or I should say make modification to those
 8 plans. Can you help me understand that for lack of
 9 a better question.
 10 MR. BARKER: Objection.
 11 A I'm not sure I understand your question. Could you
 12 rephrase --
 13 Q Sure.
 14 A Could you reask it.
 15 Q You said that on January 28th, you told the Town you
 16 didn't wanna use the preliminary plans.
 17 A Right.
 18 Q And after that, you prepared the Scope of Services.
 19 A That's correct.
 20 Q And the Scope of Services at task one discusses
 21 modification to the preliminary plans.
 22 A Correct.
 23 Q And I'm un-- I'm having difficulty understanding how
 24 the two are consistent. Does this document reflect
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1 with your conversation with Mr. Owen on
 2 January 28th?
 3 A On January 28th, Mr. Owen said it was not necessary
 4 for us to use the plans. He did not advise us or we
 5 weren't directed not use them. He just indicated it
 6 was not necessary for us to use the plans.
 7 Q As of the date that this document was prepared --
 8 A Uh-huh.
 9 Q -- was it Gannett Fleming's intent to modify those
 10 plans as indicated in task one?
 11 A At the date that this document --
 12 MR. BARKER: Objection.
 13 A -- was prepared, that was what was listed in the
 14 Scope of Services.
 15 Q At the date this document was prepared, was it
 16 Gannett Fleming's intent if it were awarded the
 17 contract to design the D.P.W. facility to modify the
 18 Plaintiff's preliminary plans as part of that
 19 undertaking?
 20 A Not necessarily.
 21 Q Is that what task one says, however?
 22 A That is what's stated --
 23 MR. BARKER: Objection.
 24 A -- in task one.
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1 results of your conversation on January 28th with
 2 Mr. Owen?
 3 A It includes both -- it includes -- as it stated in
 4 the letter, it includes the stuff from the Request
 5 for Qualifications, Request for Proposals as it was
 6 referred to, plus our conversations with Mr. Owen
 7 and information obtained during the site visit. So
 8 it's a combination of all those meetings.
 9 It doesn't necessarily preclude times
 10 or include everything that was addressed in those
 11 meetings.
 12 Q Where does this come from then? Where does this
 13 task one come from?
 14 A Where does this task one come from?
 15 Q Yes.
 16 A This --
 17 Q Because you said the proposal -- go ahead.
 18 A This I believe comes from the Request for
 19 Qualifications.
 20 Q So that was Gannett Fleming's understanding of what
 21 was requested in their Request for Qualifications,
 22 what's stated here in task one?
 23 A That's correct.
 24 Q Is this also -- task one, is this also consistent
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1 Q Why would Gannett Fleming write something that it
 2 didn't necessarily intend?
 3 MR. BARKER: Objection.
 4 A This draft Scope of Services was prepared based on
 5 information that was available at the time.
 6 MR. RUSSELL: Would you mark that,
 7 please.
 8 (Whereupon the above-described
 document was then marked as
 Plaintiff's Exhibit No. 9)
 9 Q Mr. Alberti, the Court Reporter has marked as
 10 Exhibit 9 a document on Department of the Public
 11 Works letterhead dated February 5th, 2002,
 12 addressed to Mr. Michael E. Haire, P.E., under the
 13 signature of William B. Owen, P.E. Director.
 14 Do you see that?
 15 A Yes, I do.
 16 Q Have you seen this document before?
 17 A Yes, I have.
 18 Q There's some handwritten notes on the document.
 19 do you see those?
 20 A Yes, Yes, I do.
 21 Q Do you know who made those?
 22 A Those were made by myself.
 23 Q Can you -- starting at the top of the document to
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SHEET 25 PAGE 97

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1 sort of explains why February was crossed out and
 2 March was put in.
 3 MR. RUSSELL: Would you mark that,
 4 please.
 5 (Whereupon the above-described
 6 document was then marked as
 7 Plaintiff's Exhibit No. 13)
 8 Q Mr. Alberti, marked as Exhibit 13 is a document on
 9 Department of Public Works letterhead dated
 10 March 7th, 2002, under the signature of William B.
 11 Owen addressed to Mr. Michael E. Haire, P.E.
 12 Do you see that?
 13 A Yes, I do.
 14 Q Have you seen this document before as part of this
 15 litigation?
 16 A Yes, I have.
 17 Q And do you understand that at some point, there was
 18 a contract for the above-captioned facility executed
 19 between the Town of Falmouth and Gannett Fleming?
 20 A That's my understanding.
 21 MR. RUSSELL: Would you mark that,
 22 please.
 23 (Whereupon the above-described
 24 document was then marked as
 25 Plaintiff's Exhibit No. 14)
 26 Q Mr. Alberti, marked as Exhibit 14 is a document
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1 that has -- runs 14 pages. And at the top of the
 2 first page, it reads Gannett Fleming Engineers and
 3 Architect's, P.C., 160 Wood Road, Braintree, Mass.
 4 02184. It reflects two telephone numbers and then
 5 reads -- excuse me -- a telephone number and a
 6 facsimile number and reads Agreement for
 7 Architectural Design Services.
 8 Do you have that document in front of
 9 you?
 10 A Yes, I do.
 11 Q And would this be the contract that was executed
 12 between Gannett Fleming and the Town of Falmouth
 13 relative to the D.P.W. project?
 14 A That's what it appears to be. Yes.
 15 Q And to your knowledge, as of March 7th, 2002, these
 16 were the terms that the Town and Gannett Fleming had
 17 agreed to.
 18 A Yes. As of March 7th, those were the terms.
 19 Q And included in this contract is a Scope of Services
 20 that begins on Page S-1.
 21 A Yes.
 22 Q And the scope of services continues to Page S-4.
 23 A That's correct.
 24 Q And these are the Scope of Services that Gannett
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1 Fleming offered to perform for the Town of Falmouth.
 2 MR. BARKER: Objection.
 3 A This is the Scope of Services that was included in
 4 our contract with the Town of Falmouth.
 5 Q Under the Scope of Services, task one, review
 6 existing information, do you see that?
 7 A Yes, I do.
 8 Q Is this language borrowed from that Scope of
 9 Services that we discussed earlier?
 10 A I haven't compared it word for word; but it appears
 11 to be the same.
 12 Q And the last sentence of Scope of Services, to
 13 modify the preliminary plan to incorporate the
 14 modification accepted by the D.P.W. Do you see
 15 that?
 16 A Yes, I do.
 17 Q And preliminary plan as used in that sentence refers
 18 to the plan that was attached as Addendum A or
 19 Appendix A for the Request for Qualification that we
 20 discussed previously.
 21 A It appears to represent that, yes.
 22 Q To your knowledge, is there any reason why the word
 23 is singular, preliminary plan, as opposed to plural,
 24 preliminary plans? Is there any significance to
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1 that?
 2 A Not that I'm aware of.
 3 Q Do you know when this contract was prepared?
 4 A I don't know the date that this contract was
 5 prepared at this time.
 6 Q Do you know who prepared it?
 7 A I don't know the individual that prepared it at this
 8 time.
 9 Q Was it prepared by somebody at Gannett Fleming, do
 10 you know?
 11 A My assumption is that it was prepared by somebody at
 12 Gannett Fleming.
 13 Q You don't know who that is?
 14 A I do not at this time know who prepared this
 15 particular document.
 16 Q Is it safe to say that the general conditions,
 17 Pages G-1 through G-7 are pretty much a standard
 18 document?
 19 A Yes. Those appear to be one, again, of Gannett
 20 Fleming's standard contracts.
 21 Q Do you know who prepared the Scope of Services that
 22 follows?
 23 A As I stated earlier on the draft, I believe that
 24 this information could have been prepared by
 25 Parisi Court Reporting (508) 984-5502

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SHEET 32 PAGE 125

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- 1 A They were in a notebook.
 2 Q Did you use a questionnaire?
 3 A Yes.
 4 Q And how did you use a questionnaire?
 5 A A questionnaire was used as a guide in asking
 6 questions to the D.P.W. personnel.
 7 Q But I'm just getting the sense you didn't actually
 8 write on the questionnaire. You asked questions and
 9 then would write on your notes.
 10 A That's correct.
 11 Q Is that correct? So there wouldn't be any
 12 questionnaires that contained the results of your
 13 interviews with D.P.W. personnel?
 14 A That's right. The results are contained in my
 15 notebook.
 16 Q The notebook that you've referred to, is that
 17 strictly your notebook? Or is it a Gannett Fleming
 18 notebook?
 19 A It's the project notebook of Gannett Fleming.
 20 Q And to your knowledge, how many people contributed
 21 to that notebook?
 22 A Everything in a notebook contained -- I believe
 23 everything that's in that notebook was prepared by
 24 myself.

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- 1 any other office spaces, except for the statement it
 2 says separate office from the public entrance.
 3 Separate, I should say. But in this summary, it
 4 does not appear to be other office areas listed.
 5 Q Where does it say to separate?
 6 A On the second page.
 7 Q I see it. Oh. No, I don't. Where does it say it?
 8 A At the top, first bullet.
 9 Q Okay. There it is. Separate office areas from the
 10 public entrance. Underneath that, a third bullet
 11 point from the bottom in that list says, "If
 12 possible, provide separate lunch locker facilities
 13 for highway and parks."
 14 A Yes.
 15 Q Did they explain to you why they wanted separate
 16 lunch and locker facilities for highway and parks?
 17 A My recollection is that was what they desired for
 18 space needs. They didn't indicate a specific reason
 19 for it.
 20 Q Moving onto the third page, near the middle is a
 21 notation or there's an indication person interviewed
 22 Brian Dale --
 23 A Yes.
 24 Q -- Park Superintendent, and Rocky.
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- 1 Q Okay. Let me just go over a couple of these
 2 interviews with you. On April 17th, 2002, you
 3 interviewed John Lyons and Don Swire. Is that
 4 correct?
 5 A That's correct.
 6 Q And they indicated, 5th item, what you've identified
 7 as the new administration public toilet rooms.
 8 A That's correct.
 9 Q What does that mean?
 10 A That means separate toilet facilities to be used
 11 just by public that's visiting their facility.
 12 Q Item Number 9, offices for Highway Superintendent,
 13 Assistant Highway Superintendent, Park
 14 Superintendent, Assistant Park Superintendent, and
 15 Dispatcher. Who provided you with that information?
 16 A John Lyons and Don Swire.
 17 Q And can you recall anything else about what they
 18 told you about these office spaces indicated here?
 19 A Are you referring to what they were to include?
 20 Q Sure.
 21 A That may be listed further down in my notes.
 22 Q Okay. Did they indicate any additional office space
 23 that they desired, office spaces?
 24 A At this time -- this summary does not appear to show

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- 1 A Yes.
 2 Q Do you know who Rocky is?
 3 A Rocky Gomes I believe is his last name. He's an
 4 Assistant Superintendent for Parks.
 5 Q And the third item under that, it says need
 6 office space for Superintendent and Assistant
 7 Superintendent.
 8 A That's correct.
 9 Q They each wanted their own office. Is that what
 10 that means?
 11 A That's correct.
 12 MR. RUSSELL: Would you mark that,
 13 please.
 14 (Whereupon the above-described
 document was then marked as
 Plaintiff's Exhibit No. 19)
 15 Q Mr. Alberti, the next document is a letter on the
 16 stationery of the law office of Richard M. Russell.
 17 And it's been identified as Exhibit Number 19. And
 18 the only question I have about this is to your
 19 knowledge, did Gannett Fleming receive that document
 20 on or about June 7th, 2002.
 21 MR. BARKER: Let me see it first.
 22 A Yes. To my understanding, we did receive this
 23 document on or about June 7th, 2002.
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SHEET 34 PAGE 133

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- 1 and Rocky Gomes.
 2 Q And under that, it says will be phasing out.
 3 A Yes.
 4 Q Can you tell me what that means.
 5 A I don't recall what that is referring to, as it
 6 doesn't have anything after it.
 7 Q On page GF 285, top of that page says 9/12/02,
 8 meeting agenda.
 9 A Yes.
 10 Q Can you tell me what that is intended to indicate.
 11 A That is an agenda I prepared to discuss at a meeting
 12 with members of the Department of Public Works on
 13 September 12th of 2002.
 14 Q Moving onto the next page, top of the page says
 15 issues. Do you see that?
 16 A Yes. I do.
 17 Q One, do not partially demolish small office area,
 18 Chapter 34. Did I read that correctly, if you
 19 accept that the abbreviations are forwards?
 20 A Yes.
 21 Q And is this a further agenda? Or is this notes of a
 22 meeting that took place?
 23 A This is a continuation of the agenda items that were
 24 to be discussed at the meeting requesting to the
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- 1 indicate for partial demolition of the small office
 2 area in the front. It called for the -- or
 3 indicated the complete demolition?
 4 A Partial --
 5 MR. BARKER: Objection.
 6 A Partial demolition would refer to the entire
 7 facility. And small office area is the area that
 8 we're talking about being demolished completely.
 9 Q Okay. So up until this point, there was still some
 10 consideration about demolishing a small office area
 11 completely.
 12 MR. BARKER: Objection.
 13 A No. We did not use the preliminary plans. We were
 14 just indicating to the Town that we did not want to
 15 use them; because we felt this would cause the cost
 16 to drive up.
 17 Q But you think the preliminary plans indicated the
 18 demolition of a small office area. Is that correct?
 19 A That is what we believe they -- is shown, correct.
 20 Q The note said, "Do not partially demolish." Is that
 21 what they say?
 22 A The notes do say do not partially demolish.
 23 Q And -- but it's your understanding that the plans
 24 called for complete demolition?
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- 1 Town that we do not want to use the preliminary
 2 plans.
 3 Q The Town had already told you you didn't have to use
 4 the preliminary plans.
 5 A That's correct. We wanted to confirm that we did
 6 not need to use the preliminary plans.
 7 Q And do not partially demolish small office area,
 8 Chapter 34, can you tell me what that's intended to
 9 mean.
 10 A We were concerned that the removal of the small
 11 office area as proposed in the preliminary plans
 12 would drive up the construction costs because of
 13 Chapter 34 -- Chapter 34 of the Mass. State Building
 14 Code.
 15 Q Now, I think earlier, you indicated that the
 16 preliminary plans provide for the complete
 17 demolition as opposed to the partial demolition.
 18 Do you recall that?
 19 A Yes. I recall that referring to a sketch on my --
 20 on one of my notes.
 21 Q Okay. I don't recall it as having taken place at
 22 the time.
 23 A Oh.
 24 Q But you do recall that the preliminary plans didn't
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- 1 MR. BARKER: Objection.
 2 A The -- the office area is a portion of the entire
 3 facility.
 4 Q I understand. So demolishing the entire small
 5 office area would be a partial demolition of the
 6 entire structure.
 7 A That's --
 8 Q Is that what that means?
 9 A That's correct.
 10 Q Item three, we cannot construct a central corridor
 11 as shown on preliminary plans, too -- T-O-O -- many
 12 load bearing walls. Can you tell me what that's
 13 intended to mean.
 14 A Yes. Chapter 34 discussed earlier talks -- refers
 15 to removal of lateral-load resisting elements. In
 16 the interior walls appear to be lateral-load
 17 resisting elements. So the removal of those walls
 18 would result in increased cost in the facility that
 19 we didn't feel was warranted.
 20 Q Did the actual load that was being borne, does that
 21 have any significance under Chapter 34?
 22 A I can't answer that. It would need to be answered
 23 by a structural engineer.
 24 Q Do you understand the question however?
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SHEET 36 PAGE 141

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1 time were we advised to stay within a certain
 2 number. The Town requested that we perform an
 3 independent space needs assessment.
 4 Q And this page we've been reviewing are further
 5 agenda items -- is that -- are agenda items for a
 6 meeting, not notes of a meeting. Is that correct?
 7 A That's correct.
 8 Q And you studied the preliminary plans in order to
 9 make determinations about demolishing the small
 10 office in front?
 11 MR. BARKER: Objection.
 12 A I wouldn't say that we studied them. We did a
 13 cursory review of the plans.
 14 Q And you made a cursory review of the plans in
 15 determining that the central corridor was
 16 problematic?
 17 A That is correct.
 18 Q Did you make any more review of the preliminary
 19 plans other than a cursory review?
 20 A Prior to this initiation of the proceedings here, I
 21 don't believe we did make any detailed reviews of
 22 the preliminary plans.
 23 Q You did obtain some square-footage figures.
 24 Gannett Fleming obtained some square-footage figures
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1 statement.
 2 Q It's probably more fair to say they were kind of put
 3 in final form between the first and the sixth. You
 4 might have been working on them in October or
 5 September.
 6 A Uhm.
 7 Q Or Gannett Fleming might have been.
 8 A I don't recall. I can't recall exactly when we
 9 started and finished those drawings.
 10 Q What happened after the September 12th meeting?
 11 What did Gannett Fleming do after that?
 12 A My recollection is we created additional
 13 alternatives for the Town to review based on their
 14 comments.
 15 Q Can you look through these and tell me if any of
 16 those reflect the plans that you prepared after the
 17 September 12th, '02, meeting.
 18 A I have plans here that appear to have been created
 19 and discussed at the November, 2002, meeting.
 20 Q How many pages are there?
 21 A Four pages.
 22 Q And they have GF numbers?
 23 A They do.
 24 Q And can you tell me what those are?
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1 from the plans, didn't they?
 2 A As I stated earlier, I believe that the square-
 3 footage figures that were used in the Scope of
 4 Services we assumed were based on the preliminary
 5 plans, as that was the only information available
 6 during that phase of the project, during the
 7 creation of that scope.
 8 Q And when you say scope, you're talking about a
 9 document that identifies the square-footage figures.
 10 Is that what you're referring to?
 11 A That's correct. The document identifies the
 12 approximate square-foot figures.
 13 Q If you could turn to page GF 00289, can you tell me
 14 what this page reflects.
 15 A This page appears to represent comments from the
 16 Town to the first alternatives that were created by
 17 Gannett Fleming from scratch.
 18 Q When were those first alternatives created?
 19 A In November of 2002.
 20 Q When -- when did the Town comment on them?
 21 A November 6th, 2002.
 22 Q So they were created sometime between the first and
 23 the sixth. Is that --
 24 A I don't recall the exact date, but that's a fair
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1 A Sure. GF 00024, GF 00025, 00026, and 00021.
 2 Q In that pile of papers, are there any other plans
 3 that appear to be from that November time frame?
 4 A At that first meeting you're referring to?
 5 Q Well, you said after September, you prepared some
 6 plans that the Town reviewed on November 6th.
 7 A Yes. I think I stated sometime beginning of
 8 November we prepared plans.
 9 Q Sure.
 10 A Yes.
 11 Q And I want to know what plans that were -- were
 12 reviewed with the Town on November 6th.
 13 A The four plans that I mentioned to you. However,
 14 I'd like to add a note that the comments that are on
 15 the plans are for a subsequent meeting from the
 16 Town.
 17 Q Okay.
 18 A So these were reviewed at the November meeting. And
 19 then further review was done in December.
 20 Q Are those the only plans that were available in
 21 November of 2002 that you can recall?
 22 A As far as I recall, I believe those are the only
 23 plans at this time.
 24 Q Referring back to your project notebook, page
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